

SO. CAL. EQUAL ACCESS GROUP
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Attorneys for Plaintiff
YEONG LEE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

YEONG LEE,

Plaintiff,

vs.

SOOHOO ENTERPRISES LLC; and
DOES 1 to 10,

Defendants.

Case No.: 8:24-cv-00740-FLA (DFMx)

**Plaintiff's Notice of Motion and Motion
for Default Judgment by Court**

Date: August 2, 2024

Time: 1:30 p.m.

Courtroom: 6B

Honorable Judge Fernando L. Aenlle-
Rocha

To Defendant SOOHOO ENTERPRISES LLC and the attorneys of record, if any:
Please take notice that on August 2, 2024, at 1:30 p.m., or as soon thereafter as this
matter may be heard by this Court located at 350 West First Street, Los Angeles,
California, Plaintiff YEONG LEE will present Plaintiff's motion for default judgment
against Defendant SOOHOO ENTERPRISES LLC. The Clerk has previously entered the
default on said Defendant on May 29, 2024 (Dkt. #16).

At the time and place of hearing, Plaintiff will present proof of the following
matters: (1) Defendant SOOHOO ENTERPRISES LLC is not a minor or incompetent

1 person or in military service or otherwise exempted under the Soldier and Sailor's Civil
2 Relief Act of 1940; (2) Defendant SOOHOO ENTERPRISES LLC has not appeared in
3 this action; and (3) Plaintiff is entitled to judgment against said Defendant on account of
4 the claims pleaded in the complaint, to wit: a violation of the Americans with Disabilities
5 Act.

6 The Plaintiff seeks a judgment in the amount of \$2,960.00 in attorney fees and
7 costs as set forth in the attached declaration of Jason J. Kim and an Order directing the
8 Defendant to: make alterations in such a manner that, to the maximum extent feasible, the
9 goods, services, facilities, privileges, advantages, or accommodations offered by
10 Defendant is readily accessible to and usable by individuals with disabilities at the
11 property located at or about 21501 Brookhurst St., Huntington Beach, California. This
12 motion is based on this notice, the declarations submitted in support of this motion, and
13 other matters which may be presented at the hearing.

14 Notice of the original motion for default judgment by court was served on
15 Defendant SOOHOO ENTERPRISES LLC on June 28, 2024 by first class United States
16 Mail, postage prepaid.

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18 Dated: June 28, 2024

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21 By: /s/ Jason J. Kim
22 Jason J. Kim, Esq.
23 Attorneys for Plaintiff
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